

**REMARKS**

In response to the Office Action mailed January 12, 2006, the Applicants respectfully request reconsideration. Claims 1-101 were previously pending in this application. Claims 1, 2, 38 and 39 have been amended. No claims have been cancelled. As a result claims 1-101 are pending for examination with claims 1, 22, 32, 38, 59, 69, 76 and 89 being independent claims. No new matter has been added. Applicants note the Examiner's withdrawal of the restriction requirement and thank the Examiner for reconsideration of the requirement.

**Rejections Under 35 U.S.C. §103(a)**

In section 3 of the Office Action, the Examiner rejected claims 1-3, 11-13, 18, 20, 21, 38-40, 48-50, 55, 57 and 58 under 35 U.S.C. §103(a) as being unpatentable over Recknagel et al. (U.S. Patent 6,031,343; referred to hereafter as "Recknagel") in view of Shintani (U.S. Patent 5,646,608; referred to hereafter as "Shintani").

In section 4 of the Office Action, the Examiner rejected claims 4, 5, 41 and 42 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Shintani and further in view of Sugden (U.S. Patent 5,406,176; referred to hereafter as "Sugden").

In section 5 of the Office Action, the Examiner rejected claims 6-10 and 43-47 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Shintani and further in view of Speirs et al. (U.S. Patent 5,677,603; referred to hereafter as "Speirs").

In section 6 of the Office Action, the Examiner rejected claims 14-17, 19, 51-54 and 56 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Shintani and further in view of Ducharme et al. (U.S. Patent Publication 2005/0030744 A1; referred to hereafter as "Ducharme").

In section 7 of the Office Action, the Examiner rejected claims 22-25, 27-31, 59-62 and 64-68 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Ducharme.

In section 8 of the Office Action, the Examiner rejected claims 26 and 63 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Ducharme and further in view of Rahm et al. (U.S. Patent 6,636,003; referred to hereafter as “Rahm”).

In section 9 of the Office Action, the Examiner rejected claims 32-36 and 69-74 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Launey et al. (U.S. Patent 5,086,385; referred to hereafter as “Launey”).

In section 10 of the Office Action, the Examiner rejected claims 37 and 75 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Launey and further in view of Tadokoro et al. (U.S. Patent 4,367,470; referred to hereafter as “Tadokoro”).

In section 8[sic] (page 20) of the Office Action, the Examiner rejected claim 53 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Shintani and Ducharme and further in view of Rahm.

In section 14 (page 21) of the Office Action, the Examiner rejected claims 76, 77, 89 and 90 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Shintani and Ducharme.

In section 11 (page 23) of the Office Action, the Examiner rejected claims 78 and 91 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Shintani and Ducharme and further in view of Mitchell (U.S. Patent 6,614,126; referred to hereafter as “Mitchell”).

In section 12 (page 23) of the Office Action, the Examiner rejected claims 79-82 and 92-95 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Shintani, Ducharme and Mitchell and further in view of Launey.

In section 16 (page 25) of the Office Action, the Examiner rejected claims 83-88 and 96-101 under 35 U.S.C. §103(a) as being unpatentable over Recknagel in view of Shintani and Ducharme and further in view of Speirs.

Applicants disagree and traverse the rejections.

Regarding Ducharme

With regard to the rejections under 35 U.S.C. §103(a) wherein Ducharme is cited (sections 6-8, 8[sic], 14, 11, 12 and 16), Applicants note that the subject matter of Ducharme and the subject matter of the present application were subject to an obligation of assignment to the same person, i.e., Color Kinetics, Inc. Applicants also note that Ducharme would qualify as a prior art reference only under 35 U.S.C. §102(e). As stated in 35 U.S.C. §103(c)(1):

Subject matter developed by another person, which qualifies as prior art only under one or more of subsections (e), (f), and (g) of section 102 of this title, shall not preclude patentability under this section where the subject matter and the claimed invention were, at the time the claimed invention was made, owned by the same person or subject to an obligation of assignment to the same person.

Accordingly, Ducharme does not preclude patentability of the present application and Applicants respectfully request that the rejections of claims 14-17, 19, 22-31, 51, 53, 54, 56, 59-68 and 76-101 be withdrawn.

Regarding claims 1 and 38

Applicants' independent claim 1 recites a method of illuminating an environment, comprising, among other things, providing a connector between a control system and a plurality of lights to provide a two-way data interface between the lights and the control system, wherein the connector is a cable extending between the control system and the plurality of lights, and wherein the cable has a head end and a base end. Applicants' independent claim 38, as amended recites a system for illuminating an environment, comprising among other things, a connector between the control system and a plurality of lights to provide a two-way data interface between the lights and the control system, wherein the connector is a cable extending between the control system and the plurality of lights, and wherein the cable has a head end and a base end. The Examiner notes that Recknagel does not disclose a two-way data interface. Applicants agree. However, Applicants disagree with the Examiner's contention that Shintani discloses a two-way

data interface at Fig. 4, and particularly Applicants submit that Shintani does not disclose a cable having a head end and a base end.

Shintani discloses electronic devices that have light emitters and light detectors. The light emitters provide for one-way communication to a remote control unit and the light detectors provide for one-way communication from the remote control unit to the devices. As disclosed in Shintani and shown in Figs. 1, 2, 4 and 5 thereof, the light emitters and light detectors are separate components of the various devices. For example, Fig. 1 shows devices 11-16 with light detectors 11R-16R and separate light emitters 11E-16E. In fact, air-conditioning unit 17 has only a light detector 17R and no light emitter. The Examiner contends that Shintani discloses a two-way interface between the CPU and the light emitter. However, the connection between the interface and the light emitter is a one-way connection as shown by the arrow in Fig. 1. Thus, there is not a two-way connection extending between the CPU and the light emitter.

Applicants suggest that one of skill in the art would not consider the emitters and detectors disclosed in Shintani to be connectors, and would certainly not consider them to be cables having a head end and a base end. The infrared emitters and detectors in Shintani are incompatible with the data cable in Recknagel. Even accepting the Examiner's characterization of the Shintani emitters and detectors as connectors, Shintani fails to disclose a single cable connector that provides a two-way data interface. Each of the separate light emitters and detectors disclosed in Shintani provides for only a one-way communication with the remote control unit.

Applicants respectfully submit that claims 1 and 38 as amended are patentable over the combination of Recknagel and Shintani because the obviousness criteria specified in MPEP §2143 are not met. First, as described in the above remarks, the Recknagel and Shintani connectors are not analogous art and there is no motivation to combine the references. Second, since Recknagel and Shintani are not analogous art, there can be no reasonable expectation of success in combining the references. Thirdly, Recknagel and Shintani, alone or in any combination, fail to teach or suggest all of the

features recited in each of the Applicants' claims 1 and 38. At the least, Recknagel and Shintani fail to teach or suggest a connector providing a "two-way data interface between ... lights and [a] control system, wherein the connector is a cable having a head end and a base end".

Claims 2-21 and 39-58 depend directly or indirectly on claims 1 and 38, respectively and are thus allowable at least by dependency. Accordingly, Applicants traverse the rejections of the dependent claims 2-21 and 39-58 and respectfully request withdrawal of the rejections of claims 2-21 and 39-58.

Regarding claims 32 and 69

Applicants independent claim 32, as amended, recites a method of lighting an aircraft environment, comprising, at least in part, configuring the control system to respond to signals from at least one other system of the aircraft and to generate lighting control signals in response to the signals from the at least one other system. Applicants independent claim 69, as amended, recites a system of lighting an aircraft environment, comprising, at least in part, a control system configured to respond to signals from at least one other system of the aircraft and to generate lighting control signals in response to the signals from the at least one other system. The Examiner concedes that Recknagel does not disclose configuring the control system to respond to signals from another system of the aircraft. Applicants agree. However, the Examiner contends that Launey discloses configuring the control system to respond to signals from at least one other system of the aircraft and to generate lighting control signals in response to signals from the at least one other system. Applicants disagree.

Launey discloses an expandable home automation controller supporting multiple numbers and multiple different types of data communications with appliances and subsystems within the home. While Launey illustrates a lighting system controller (30) in Fig. 1, Launey does not describe that the controller responds to signals from other systems. As cited by the Examiner (col. 3, lines 1-10), Launey describes a home automation control system having a primary object of providing an expandable system

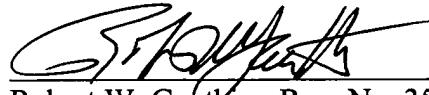
for providing control over complex subsystems found in a home. Launey does not teach or suggest that the lighting system responds to signals from another system. As further cited by the Examiner (col. 12, lines 1-20), Launey describes a multitude of systems and/or devices that can be controlled by the home automation system. Here again, Launey does not teach configuring the lighting control system to respond to signals from at least one other system and to generate lighting control signals in response to signals from the other system.

As set forth in MPEP § 2143, to establish a *prima facie* case of obviousness, at the least the references must teach or suggest all of the claimed features. Since neither Recknagel nor Launey, alone or in any combination, teach or suggest all of the features recited in each of the Applicants' claims 32 and 69, Applicants respectfully submit that claims 32 and 69 as amended are patentable over the combination of Recknagel and Launey. Claims 33-37 and 70-75 depend directly or indirectly on claims 32 and 69, respectively and are thus allowable at least by dependency. Accordingly, Applicants traverse the rejections of the dependent claims 33-37 and 70-75 and respectfully request withdrawal of the rejections of claims 33-37 and 70-75.

**CONCLUSION**

In view of the foregoing amendments and remarks, reconsideration is respectfully requested. This application should now be in condition for allowance; a notice to this effect is respectfully requested. If the Examiner believes, after this amendment, that the application is not in condition for allowance, the Examiner is requested to call the Applicant's attorney at the telephone number listed below.

Respectfully submitted,



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